

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

CRIMINAL NO. 04-10073-WG

v.

VIOLATION:

18 U.S.C. § 1542 --

Passport Fraud

ELIAS ABAD a/k/a

GREGORIO GARCIA

INFORMATION

COUNT ONE: (18 U.S.C. § 1542 -- Passport Fraud)

The United States Attorney charges that:

On or about May 17, 2003, at Boston, in the District of
Massachusetts,

ELIAS ABAD, a/k/a GREGORIO GARCIA,
defendant herein, did willfully and knowingly make a false
statement in an application for passport with intent to induce
and secure the issuance of a passport under the authority of the
United States, for his own use and the use of another, contrary
to the laws regulating the issuance of passports and the rules
prescribed pursuant to such laws.

All in violation of Title 18, United States Code, Section
1542.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:



DONALD L. CABELL
Assistant U.S. Attorney

Date: March 16, 2004